

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

In Re:	)	Case No:	18-02392
Matthew Zaradich	)		
Debtors	)	Chapter:	Chapter 13
	)		
	)	Judge:	LaShonda A. Hunt

NOTICE OF MOTION

To: Matthew Zaradich, 5115 N. Winchester Ave. #3, Chicago, IL 60640  
Marilyn O. Marshall, 224 S. Michigan Ave. #800, Chicago, IL, 60604  
Office of the US Trustee, 219 S. Dearborn, Suite 873, Chicago, IL 60604

SEE ATTACHED SERVICE LIST OF ALL CREDITORS

**PLEASE TAKE NOTICE** that on **April 15, 2019 at 9:30 a.m.** I shall appear before the Honorable Judge **LaShonda A. Hunt** at 219 S. Dearborn St. # 719, Chicago IL 60604 and then and there present the attached **MOTION TO MODIFY CONFIRMED PLAN**, a copy of which is attached hereto.

By: /s/ Dale Riley  
Dale Riley

CERTIFICATE OF SERVICE

I, Dale Riley, hereby certify that I served a copy of this Notice along with the aforementioned document upon the above parties, by causing the same to be mailed in a properly addressed envelope, postage prepaid, for 55 E. Monroe, Suite 3400, Chicago, Illinois, on 3/19/2019.

By: /s/Dale Riley  
Dale Riley

Attorneys for the Debtor

Geraci Law L.L.C.  
55 E. Monroe Street #3400  
Chicago, Illinois 60603  
(Ph): 312.332.1800 (Fax): 877.247.1960

BK OF AMER

Attn: Bankruptcy Dept.  
Po Box 982238  
El Paso TX 79998

CAP1/Bstby

Attn: Bankruptcy Dept.  
26525 N Riverwoods Blvd  
Mettawa IL 60045

Capitalone

Attn: Bankruptcy Dept.  
15000 Capital One Dr  
Richmond VA 23238

Chase CARD

Attn: Bankruptcy Dept.  
Po Box 15298  
Wilmington DE 19850

CITI

Attn: Bankruptcy Dept.  
Po Box 6190  
Sioux Falls SD 57117

CITI

Attn: Bankruptcy Dept.  
Po Box 6241  
Sioux Falls SD 57117

Discover FIN SVCS LLC

Attn: Bankruptcy Dept.  
Po Box 15316  
Wilmington DE 19850

Fifth Third BANK

Attn: Bankruptcy Dept.  
5050 Kingsley Dr  
Cincinnati OH 45227

ICM Properties

3080 N. Lincoln Ave.  
Chicago IL 60657

Navient

Attn: Bankruptcy Dept.  
Po Box 9500  
Wilkes Barre PA 18773

Upstart Network INC.

Attn: Bankruptcy Dept.  
2 Circle Star Way  
San Carlos CA 94070

US BANK

Attn: Bankruptcy Dept.  
4325 17Th Ave S  
Fargo ND 58125

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

<b>In Re:</b> <b>Matthew Zaradich,</b> <b>Debtor</b>	) ) ) ) )	<b>Case No: 18-02392</b>  <b>Chapter: Chapter 13</b>  <b>Judge: LaShonda A. Hunt</b>
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**MOTION TO MODIFY CONFIRMED PLAN**

NOW COMES the Debtor, Mr. Matthew Zaradich (the “Debtor”), by and through his attorneys, Geraci Law L.L.C., to present his **MOTION TO MODIFY CONFIRMED PLAN**, and states as follows:

1. This Court has jurisdiction over this proceeding pursuant to 28 U.S.C. 1334 and this is a “core proceeding” under 28 U.S.C. 157(b)(2).
2. The Debtor filed his Petition for Relief and plan under Chapter 13 of the U.S. Bankruptcy Act on 01/29/2018.
3. The Debtor’s plan was confirmed by the Court on 04/16/2018 with monthly plan payments of \$495.
4. The Debtor fell behind on his Chapter 13 plan payments because he lost his job.
5. The Debtor has started a new job and is able to resume plan payments, however he is unable to cure the default.
6. The Debtor is receiving less income at his new job and as such his budget will now support monthly plan payments of no greater than \$325. See Exhibit A for an updated budget.
7. For the reasons stated above, it is necessary for the successful completion of the Debtor’s plan to reduce the monthly Chapter 13 plan payment to \$325 and to waive \$665 in arrears so that the plan will remain feasible to complete within 60 months.

Honorable Court enter an order:

1. Reducing the monthly Chapter 13 plan payment to \$325,
2. Waiving \$665 in arrears,
3. Any other relief the court deems proper.

By: /s/ Dale Riley  
Dale Riley

**Attorneys for the Debtor**

Geraci Law L.L.C.

55 E. Monroe Street #3400

Chicago, Illinois 60603

(Ph): 312.332.1800 (Fax): 877.247.1960